

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROLEX WATCH U.S.A., INC.

Plaintiff,

v.

PRL USA HOLDINGS, INC.

Defendant.

CIVIL ACTION

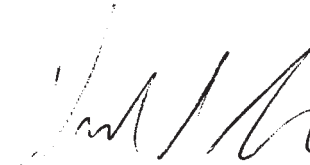
NO. 1:12-CV-6006-TPG

**NOTICE OF DEFENDANT'S OPPOSITION TO PLAINTIFF'S
MOTIONS TO DISMISS AND FOR SUMMARY JUDGMENT
AND OF DEFENDANT'S CROSS-MOTION FOR SUMMARY
JUDGMENT ON COUNT II OF THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon PRL Holdings USA, Inc.'s ("RL") Memorandum of Law in Opposition to Rolex's Motions to Dismiss and for Summary Judgment and in Support of its Cross-Motion for Summary Judgment on Count II of the Amended Complaint, the accompanying Declaration of Anna Dalla Val and the exhibits attached thereto, RL's Statement of Undisputed Material Facts pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1(a) of the Local Rules of the United States District Court for the Southern District of New York, and upon all the papers and pleadings filed in this action, Defendant RL will move this Court before the Honorable Thomas Griesa, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, NY 10007, on a date to be

determined, for an Order pursuant to Federal Rule of Civil Procedure 56 granting its Cross-Motion for Summary Judgment on Count II of the Amended Complaint. RL respectfully requests that the Court hear oral argument in connection with the pending motions.

Dated: September 22, 2014



GREENBERG TRAURIG, LLP
Daniel I. Schloss (schlossd@gtlaw.com)
Daniel J. Navarro (navarro@gtlaw.com)
Melissa B. Berger (bergerm@gtlaw.com)
200 Park Avenue, 34th Floor
New York, NY 10166
Telephone: (212) 801-9200
Facsimile: (212) 801-6400
*Attorneys for Defendant PRL USA
Holdings, Inc.*

CERTIFICATE OF SERVICE

I, Daniel J. Navarro, hereby certify that on September 22, 2014, I have served:

1. Notice of Defendant's Opposition to Plaintiff's Motions to Dismiss and for Summary Judgment and in Support of Defendant's Cross-Motion for Summary Judgment on Count II of the Amended Complaint; and
2. Declaration of Anna Dalla Val in Support of Defendant's Memorandum of Law in Opposition to Plaintiff's Motions to Dismiss and for Summary Judgment and in Support of Defendant's Cross-Motion for Summary Judgment on Count II of the Amended Complaint, and Exhibits A-P attached thereto; and
3. Defendant's Statement of Material Facts in Opposition to Plaintiff's Motions to Dismiss and for Summary Judgment and in Support of Defendant's Cross-Motion for Summary Judgment on Count II of the Amended Complaint; and
4. Defendant's Memorandum of Law in Opposition to Plaintiff's Motions to Dismiss and for Summary Judgment and in Support of Defendant's Cross-Motion for Summary Judgment on Count II of the Amended Complaint

upon Plaintiff Rolex Watch U.S.A., Inc. by causing a true and correct copy thereof to be sent by email, and First Class Mail, postage prepaid, addressed to Rolex Watch U.S.A., Inc.'s counsel of record as follows:

KING & SPALDING LLP
Kathleen E. McCarthy (kmccarthy@kslaw.com)
Mark Francis (mfrancis@kslaw.com)
1185 Avenue of the Americas
New York, NY 10036

This 22nd day of September, 2014.

/Daniel J. Navarro/
Daniel J. Navarro